

# Stakeholder Comments Template

## Reliability Services Initiative - Phase 2

### Revised Draft Final Proposal

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the revised draft final proposal for the Reliability Services Initiative - Phase 2 that was posted on July 7, 2016. The revised draft final proposal and other information related to this initiative may be found at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **July 21, 2016**.

If you are interested in providing written comments, please organize your comments into one or more of the categories listed below as well as state if you support, oppose, or have no comment on the proposal.

1. Clarify Local Regulatory Authority (LRA) interaction and process alignment. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE has no issue with CAISO deciding to not pursue this topic at this time.

2. Substitution for flexible capacity resources on planned outage. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE supports this proposal and believes it is correct for the CAISO to allow a resource to provide substitute capacity if it is able to meet the appropriate flexible category Must Offer Obligation. On the July 14<sup>th</sup>, 2016 stakeholder call CAISO clarified that any flexible resource going on planned outage will go through the same process as a generic RA resources to determine if replacement capacity is needed. SCE believes it is valuable to add this language to the proposal in order for stakeholders to clearly understand how this process will work.

3. Separate local and system RA for purpose of forced outage substitution. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE does not object to the policy developed within this initiative. It seems reasonable to begin separate system and local RA showings. SCE notes, however, that significant work is still needed to outline the details of and implement this policy change.

4. Process to update EFC list during the year. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE supports the proposal to allow scheduling coordinators to update the EFC list by request throughout the year.

5. Address the RAAIM exemption currently in place for combined flexible capacity resources. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

6. Streamlining monthly RA showings. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE has no issue with CAISO deciding to not pursue this topic at this time.

7. RA showing requirements for small LSEs. *Please state if you support (please list any conditions), oppose, or have no comment on the proposal.*

SCE believes the CAISO needs to regularly publish information on the effects of this policy change if it is implemented. Primarily, the CAISO will need to publish the amount of MW, by category (Generic, Local, Flexible) that are being waived for LSE's so that stakeholders can be aware of the magnitude of RA that is no longer being provided for system reliability. The ISO will also need to identify any backstop procurement and resulting cost allocation that would not have occurred if these RA requirements were not waived.

8. Other